

Judge McMahon

UNITES STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

x

UNITED STATES OF AMERICA : INDICTMENT

- v. -

LENIN VILLALOBOS,
a/k/a "Lenny,"

11¹¹ CRIM 103

Defendant.

:

x

COUNT ONE

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 2/3/11

The Grand Jury charges:

1. From at least in or about 2006 up to and including 2010, in the Southern District of New York and elsewhere, LENIN VILLALOBOS, a/k/a "Lenny," the defendant, and others known and unknown, unlawfully, willfully and knowingly did combine, conspire, confederate and agree together and with each other to violate Title 18, United States Code, Sections 1956(a)(1)(A)(i), 1956(a)(1)(B)(i), and 1957(a).

2. It was a part and an object of the conspiracy that LENIN VILLALOBOS, a/k/a "Lenny," the defendant, and others known and unknown, in an offense involving and affecting interstate and foreign commerce, knowing that the property involved in certain financial transactions, to wit, cash and wire transfers, represented the proceeds of some form of unlawful activity, unlawfully, willfully, and knowingly would and did conduct and attempt to conduct such financial transactions which in fact

involved the proceeds of specified unlawful activity, to wit, the proceeds of illegal narcotics transactions, with the intent to promote the carrying on of specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(A)(i).

3. It was a further part and an object of the conspiracy that LENIN VILLALOBOS, a/k/a "Lenny," the defendant, and others known and unknown, in an offense involving and affecting interstate and foreign commerce, knowing that the property involved in certain financial transactions, to wit, cash and wire transfers, represented the proceeds of some form of unlawful activity, unlawfully, willfully, and knowingly would and did conduct and attempt to conduct such financial transactions which in fact involved the proceeds of specified unlawful activity, to wit, the proceeds of illegal narcotics transactions, knowing that the transactions were designed in whole and in part to conceal and disguise the nature, the location, the source, the ownership and the control of the proceeds of specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

4. It was a further part and an object of the conspiracy that LENIN VILLALOBOS, a/k/a "Lenny," the defendant, and others known and unknown, within the United States and involving United States persons, in an offense involving and

affecting interstate and foreign commerce, unlawfully, willfully, and knowingly would and did engage and attempt to engage in monetary transactions in criminally derived property of a value greater than \$10,000 that is derived from specified unlawful activity, to wit, narcotics trafficking activities, in violation of Title 18, United States Code, Section 1957(a).

OVERT ACTS

5. In furtherance of said conspiracy and to effect the illegal objects thereof, the following overt act, among others, was committed in the Southern District of New York and elsewhere:

a. On or about May 27, 2009, LENIN VILLALOBOS, a/k/a "Lenny," the defendant, met with a cooperating witness in New York, New York to engage in a money laundering activity.

(Title 18, United States Code, Section 1956(h).)

FORFEITURE ALLEGATION

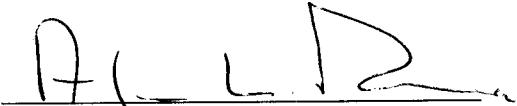
6. As the result of committing the money laundering offense in violation of Title 18, United States Code, Section 1956, alleged in Count One of this Indictment, LENIN VILLALOBOS, a/k/a "Lenny," the defendant, shall forfeit to the United States pursuant to Title 18, United States Code, Section 982(a)(1), all property, real and personal, involved in the money laundering offense and all property traceable to such property.

7. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to 18 U.S.C. § 982(b), to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Sections 982 and 1956.)



FOREPERSON



PREET BHARARA
United States Attorney

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INDICTMENT

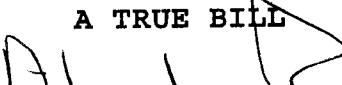
11 Cr.

(Title 18, United States Code, Section
1956(h).)

PREET BHARARA

United States Attorney.

A TRUE BILL


Foreperson.

2/3/11 Filed indictment. Case assigned
to Judge McMahon.

I Mag. Judge Laff